EXHIBIT B

1   UNITED STATES DISTRICT COURT

2   FOR THE DISTRICT OF DELAWARE

3

4   IPLEARN LLC   :   CA NO. 11-825-RGA

5   :   October 23, 2012

6   Plaintiff,   :

7   :   8:30 O'clock a.m.

8   v.   :

9   :

10   BEELINE ACQUISITION CORP, ET :

11   AL   :

12   :

13   Defendants,   :

14   . . . .

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17   TRANSCRIPT OF MOTION FOR PROTECTIVE ORDER

18   BEFORE THE HONORABLE RICHARD G. ANDREWS

19   UNITED STATES DISTRICT JUDGE

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22   APPEARANCES:

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24   For Plaintiff: CONNOLLY GALLAGHER

25   BY: ARTHUR G. CONNOLLY, III, ESQ

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1   THE COURT: Fredricka, okay. Thanks.

2   I did read the papers. It seems to me that the harm is

3   to some extent and the risks that are involved in the

4   acquisition of the patents is not of the same magnitude as to

5   when you're doing patent prosecution. There's the ability to do

6   some shaping of claims.

7   I think it's safe to point out that IpLearn makes about

8   the patents that are in existence. They are out there and that

9   is what tips the balance here.

10   I would not extend the prosecution bar to include

11   patent acquisition activities.

12   As I said, I don't think what Oracle has or has not

13   done in other cases makes any difference.

14   I don't think the fact that there's agreement should be

15   a patent prosecution bar should make any difference either.

16   When the parties agree on things, I am not going to hold

17   that against them because I would like them to agree on things.

18   So, I don't include patent acquisition in the proposed

19   order, all right?

20   MR. GROSSMAN: May I address that one issue really

21   quickly?

22   THE COURT: What issue?

23   MR. GROSSMAN: The issue of whether or not you can

24   shape claims in connection with patent activity.

25   THE COURT: Say that again.